

## **EXHIBIT D**

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*Special Counsel for Irving H. Picard, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation  
(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of Bernard  
L. Madoff,

Plaintiff,

v.

ROYAL BANK OF CANADA; GUERNROY  
LIMITED; ROYAL BANK OF CANADA  
(CHANNEL ISLANDS) LIMITED; ROYAL BANK  
OF CANADA TRUST COMPANY (JERSEY)  
LIMITED; ROYAL BANK OF CANADA (ASIA)  
LIMITED; ROYAL BANK OF CANADA (SUISSE)  
S.A.; RBC DOMINION SECURITIES INC.; and  
RBC ALTERNATIVE ASSETS, L.P.;

Defendants.

Adv. Pro. No. 12-01699 (SMB)

**[PROPOSED] ORDER GRANTING THE TRUSTEE' S MOTION FOR LEAVE TO  
FILE AMENDED COMPLAINT**

This cause having come before the Court on \_\_\_\_\_ on the motion (“Motion”) of Irving H. Picard (“Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Windels Marx Lane & Mittendorf, LLP, seeking entry of an order, pursuant to Rule 15 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rule 7015 of the Federal Rules of Bankruptcy Procedure, granting the Trustee’s request for leave to file an Amended Complaint; and the Court having considered the Memorandum of Law in Support of Trustee’s Motion for Leave to File Amended Complaint and the Declaration of Kim M. Longo in Support of Trustee’s Motion for Leave to File Amended Complaint; and any objections thereto; and due notice of the Motion having been given, and it appearing that no other or further notice need be given; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon the proceedings before the Court and after due deliberation, it is hereby

**ORDERED THAT:**

1. The Motion is GRANTED.
2. The Trustee is granted leave to file his Amended Complaint.

Dated: \_\_\_\_\_, 2021  
New York, New York.

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE